

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 KENT D. HARRIS  
Deputy Attorney General  
4 State Bar No. 144804  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-7859  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2011-101**

12 **TI ANN TAYLOR**  
1308 Emma Drive  
13 Iowa Park, Texas 76367

**ACCUSATION**

14 **Registered Nurse License No. 548536**

15 Respondent.

16  
17 Louise R. Bailey, M.Ed., RN ("Complainant") alleges:

18 **PARTIES**

19 1. Complainant brings this Accusation solely in her official capacity as the Interim  
20 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer  
21 Affairs.

22 2. On or about October 2, 1998, the Board issued Registered Nurse License Number  
23 548536 to Ti Ann Taylor ("Respondent"). The license was in full force and effect at all times  
24 relevant to the charges brought herein. The license expired on April 30, 2000, and has not been  
25 renewed.

26 ///

27 ///

28 ///



1 child), a crime that is substantially related to the qualifications, functions or duties of a registered  
2 nurse.

3 **PRAYER**

4 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,  
5 and that following the hearing, the Board of Registered Nursing issue a decision:

6 1. Revoking or suspending Registered Nurse License Number 548536, issued to Ti Ann  
7 Taylor;

8 2. Ordering Ti Ann Taylor to pay the Board of Registered Nursing the reasonable costs  
9 of the investigation and enforcement of this case, pursuant to Business and Professions Code  
10 section 125.3; and,

11 3. Taking such other and further action as deemed necessary and proper.

12 DATED: 8/16/10

13 *for* *Louise Bailey*  
14 LOUISE R. BAILEY, M.ED., RN  
15 Interim Executive Officer  
16 Board of Registered Nursing  
17 Department of Consumer Affairs  
18 State of California  
19 Complainant  
20  
21  
22  
23  
24  
25  
26  
27  
28